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                             UNITED STATES DISTRICT COURT
                          NORTHERN DISTRICT OF CALIFORNIA
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                                 SAN FRANCISCO DIVISION
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                                                   Case No.: 3:17-cv-00939 WHA
     WAYMO LLC,
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                                                   DECLARATION OF MILES EHRLICH
                  Plaintiff.
                                                   IN SUPPORT OF PLAINTIFF
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                                                   WAYMO'S ADMINISTRATIVE
           v.
                                                   MOTION TO FILE UNDER SEAL
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                                                   PORTIONS OF JOINT PRETRIAL
                                                   FILINGS (Docket No. 1724)
     UBER TECHNOLOGIES, INC., et al.,
16
                  Defendants.
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     I, Miles Ehrlich, declare as follows:
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           1.
                  I am an attorney licensed to practice in the State of California and am admitted to
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     practice before this Court. I am a partner at the law firm Ramsey & Ehrlich LLP, counsel for
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    Non-Party Anthony Levandowski. I have personal knowledge of the matters set forth in this
24
    Declaration, and if called as a witness I would testify competently to those matters.
           2.
25
                  I make this declaration in support of Waymo's Administrative Motion to File
     Under Seal Portions of Joint Pretrial Filings, filed on September 21, 2017, Docket No. 1724
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27
     ("Waymo's Administrative Motion"). The Administrative Motion seeks an order sealing the
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     following documents based on Mr. Levandowski's designation of privilege:
     EHRLICH DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL
     Case No. 3:17-00939-WHA
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Document	Portion to Be Filed Under Seal	Designating Party
Appendix B to Joint Proposed Pretrial Order	Highlighted Portions	Anthony Levandowski (red highlighting)
Joint Proposed Jury Instructions	Highlighted Portions	Anthony Levandowski (red highlighting)

- 3. Mr. Levandowski seeks to maintain the confidentiality of the red highlighted portions of Appendix B to the Joint Proposed Pretrial Order. The red highlighted portions reflect confidential and sensitive information regarding Mr. Levandowski's business entities that are wholly unrelated to this litigation; therefore, he requests that the red highlighted portion of this document remain under seal.
- 4. Mr. Levandowski does not assert that the red highlighted portions of the Joint Proposed Jury Instructions merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in Berkeley, California, on September 25, 2017.

Date: September 25, 2017 Respectfully submitted,

/s/ Miles Ehrlich Miles Ehrlich Ramsey & Ehrlich LLP

> Counsel for Non-Party Anthony Levandowski

EHRLICH DECLARATION ISO WAYMO'S ADMINISTRATIVE MOTION TO FILE UNDER SEAL Case No. 3:17-00939-WHA